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5 Attorneys for Defendants  
6 The Ant Commandos, Hong Lip Yow,  
and Raymond Yow

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

11 ACTIVISION PUBLISHING, INC.  
12 Plaintiff,

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15 JOHN TAM, an individual, JAMIE  
16 YANG, an individual, COREY FONG,  
17 an individual, DOUG KENNEDY, and  
18 individual, HONG LIP YOW, and  
19 individual, RAYMOND YOW, and  
individual, REVERB  
COMMUNICATIONS, INC., a  
California corporation, and THE ANT  
COMMANDOS, INC., a California  
corporation

## Defendants.

CASE NO. C 07-03536 MEJ

**ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL  
UNREDACTED REPLY TO DOUG  
KENNEDY'S AND REVERB  
COMMUNICATIONS, INC'S  
OPPOSITION TO MOTION FOR  
ORDER FOR DETERMINATION  
OF GOOD FAITH SETTLEMENT  
BETWEEN PLAINTIFF AND  
DEFENDANTS THE ANT  
COMMANDOS, HONG LIP YOW,  
AND RAYMOND YOW;  
DECLARATION OF MICHAEL A.  
OSWALD IN SUPPORT  
THEREOF; AND DECLARATION  
OF RAYMOND YOW IN  
SUPPORT THEREOF**

**DECLARATION OF MICHAEL A.  
OSWALD [filed concurrently  
herewith];**

## [PROPOSED] ORDER

Date: August 30, 2007  
Time: 10:00 AM  
Dept: Courtroom B, 15th Floor  
Judge: Maria Elena James

1 Pursuant to Civil Local Rule 79-5, Defendants The Ant Commandos, Hong  
2 Lip Yow, and Raymond Yow (hereinafter collectively "TAC Defendants") hereby  
3 submit their Administrative Motion to File Under Seal their unredacted Reply to  
4 Opposition to Motion for Order Determining Good Faith Settlement ("Reply"),  
5 Declaration of Michael A. Oswald ("Oswald Declaration"), and Declaration of  
6 Raymond Yow ("Yow Declaration") in support thereof, because those documents  
7 contain information regarding a confidential settlement agreement entered into  
8 between the parties. The Plaintiff and TAC Defendants all agreed to maintain the  
9 confidentiality of the settlement agreement entered into by the parties.

10 The Reply, Oswald Declaration, and Yow Declaration also address a false  
11 statement made in the Opposition regarding The Ant Commandos, and The Ant  
12 Commandos seek to prevent the further publication of that false statement in the  
13 Reply, the Oswald Declaration, and Yow Declaration. The false statement is  
14 addressed in the Reply on page 4:21-23, page 5:1 - 8, the Oswald Declaration ¶ 6,  
15 and Yow Declaration ¶ 4.

16 Prior to this case being transferred to the Northern District, the TAC  
17 Defendants' Motion for Order Determining Good Faith Settlement was filed under  
18 seal pursuant to the Joint Stipulated Protective Order signed by all of the parties  
19 and so ordered by the United States Magistrate Judge on January 31, 2007. The  
20 TAC Defendants respectfully request that the unredacted Reply, Oswald  
21 Declaration, and Yow Declaration also be filed under seal.

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1 OSWALD & YAP  
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4 Dated: August 9, 2007

5 By: /s/

6 Michael A. Oswald  
7 Claudia Mourad  
8 Attorneys for Defendants, The Ant  
9 Commandos, Hong Lip Yow, and Raymond  
10 Yow

11 **IT IS SO ORDERED:**

12 Dated: \_\_\_\_\_, 2007

13 Honorable Maria Elena James  
14 Judge of the United States District  
15 Court

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